

December 19, 2017

VIA HAND DELIVERY AND OVERNIGHT MAIL

Luly E. Massaro, Commission Clerk
Rhode Island Public Utilities Commission
89 Jefferson Boulevard
Warwick, RI 02888

RE: Docket 4770 - Application of The Narragansett Electric Company d/b/a National Grid for Approval of a Change in Electric and Gas Base Distribution Rates Responses to PUC Data Requests – Set 1

Dear Ms. Massaro:

Enclosed is an original and one copy of the Company's¹ responses to the first set of data requests issued by the Public Utilities Commission (PUC) in the above-referenced docket. At the PUC's request, the Company is also enclosing a table of contents indicating where each response can be found in the set.

This filing includes a Motion for Protective Treatment of Confidential Information in accordance with Rule 1.2(g) of the PUC's Rules of Practice and Procedure and R.I. Gen. Laws § 38-2-2(4)(B) for the Company's responses to data request PUC 1-16. The Company seeks protection from public disclosure of certain confidential information contained in Attachment PUC 1-16-1 and Attachment PUC 1-16-3. Accordingly, the Company has provided the PUC with one complete, unredacted copy of the confidential documents in a sealed envelope marked "**Contains Privileged and Confidential Information – Do Not Release,**" and has included redacted copies of these materials for the public filing.

Because of the voluminous nature of this filing, the Company is also including a USB Flash Drive containing the public version of this filing.

The enclosed responses complete the PUC's first set of data requests, as indicated in the enclosed discovery log.

¹ The Narragansett Electric Company d/b/a National Grid (the Company).

Luly E. Massaro, Commission Clerk
Responses to PUC Data Requests – Set 1
December 19, 2017
Page 2 of 2

Thank you for your attention to this transmittal. If you have any questions, please contact me at 781-907-2153.

Very truly yours,

A handwritten signature in blue ink that reads "Celia B. O'Brien". The signature is written in a cursive, flowing style.

Celia B. O'Brien

Enclosures

cc: Docket 4770 Service List
Macky McCleary, Division
Jonathan Schrag, Division
Steve Scialabba, Division
John Bell, Division
Leo Wold, Esq.

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
BEFORE THE PUBLIC UTILITIES COMMISSION**

IN RE: THE NARRAGANSETT ELECTRIC COMPANY)	Docket No. 4770
d/b/a NATIONAL GRID – ELECTRIC AND GAS)	
DISTRIBUTION RATE FILING)	
_____)	

**THE COMPANY’S MOTION
FOR PROTECTIVE TREATMENT OF CONFIDENTIAL INFORMATION**

The Company¹ respectfully requests that the Rhode Island Public Utilities Commission (PUC) provide confidential treatment and grant protection from public disclosure of certain confidential, competitively sensitive, and proprietary information submitted in this proceeding, as permitted by PUC Rule 1.2(g) and R.I. Gen. Laws. § 38-2-2(4)(B). The Company also requests that, pending entry of that finding, the PUC preliminarily grant the Company’s request for confidential treatment pursuant to Rule 1.2(g)(2).

I. BACKGROUND

On December 19, 2017, the Company filed with the PUC responses to the PUC’s First Set of Data Requests Directed to National Grid (PUC Set 1). PUC Set 1 includes Data Request PUC 1-16 (seeking the capital authorization for all projects begun or finished since January 1, 2013 of \$250,000 or more in magnitude). The Company’s response to Data Request PUC 1-16 for Narragansett Electric includes redacted and un-redacted versions of Attachment PUC 1-16-1 and Attachment PUC 1-16-3. Each of these attachments contains confidential critical energy infrastructure information (CEII), which cannot be shared publicly. The Company, therefore, requests that, pursuant to Rule

¹ The Narragansett Electric Company d/b/a National Grid (the Company).

1.2(g), the PUC afford confidential treatment to the information contained in the un-redacted versions of Attachment PUC 1-16-1 and Attachment PUC 1-16-3 provided with the Company's response to Data Request PUC 1-16.

II. LEGAL STANDARD

PUC Rule 1.2(g) provides that access to public records shall be granted in accordance with the Access to Public Records Act (APRA), R.I. Gen. Laws § 38-2-1, *et seq.* Under the APRA, all documents and materials submitted in connection with the transaction of official business by an agency is deemed to be a "public record," unless the information contained in such documents and materials falls within one of the exceptions specifically identified in R.I. Gen. Laws § 38-2-2(4). Therefore, to the extent that information provided to the PUC falls within one of the designated exceptions to the public records law, the PUC has the authority under the terms of the APRA to deem such information to be confidential and to protect that information from public disclosure.

In that regard, R.I. Gen. Laws § 38-2-2(4)(B) provides that the following types of records shall not be deemed public:

Trade secrets and commercial or financial information obtained from a person, firm, or corporation which is of a privileged or confidential nature.

The Rhode Island Supreme Court has held that this confidential information exemption applies where disclosure of information would be likely either to (1) impair the Government's ability to obtain necessary information in the future; or (2) cause substantial harm to the competitive position of the person from whom the information was obtained. Providence Journal Company v. Convention Center Authority, 774 A.2d 40 (R.I. 2001).

The first prong of the test is satisfied when information is provided voluntarily to the governmental agency and such information is of a kind that customarily would not be released to the public by the person from whom it was obtained. Providence Journal, 774 A.2d at 47.

III. BASIS FOR CONFIDENTIALITY

The information contained in the un-redacted versions of Attachment PUC 1-16-1 and Attachment PUC 1-16-3 is confidential and proprietary CEII. Public disclosure of this information would jeopardize the Company's ability to provide safe and reliable service to its customers. Furthermore, the Company is providing this information to the PUC voluntarily to aid in its consideration of the issues in this docket even though, ordinarily, the Company would not release CEII to the public. Accordingly, the Company's request for protective treatment of the unredacted versions of Attachment PUC 1-16-1 and Attachment PUC 1-16-3 satisfies the statutory standard to protect this information from becoming a part of the public record under the APRA. R.I. Gen. Laws § 38-2-2(4)(B); Providence Journal, 774 A.2d at 47. Therefore, the Company is providing the un-redacted versions of Attachment PUC 1-16-1 and Attachment PUC 1-16-3 and respectfully requests that the PUC provide confidential treatment to these attachments.

IV. CONCLUSION

Accordingly, the Company respectfully requests that the PUC grant protective treatment to the un-redacted versions of Attachment PUC 1-16-1 and Attachment PUC 1-16-3.

WHEREFORE, the Company respectfully requests that the PUC grant this Motion for Protective Treatment.

Respectfully submitted,

**THE NARRAGANSETT ELECTRIC
COMPANY**

By its attorneys,



Celia B. O'Brien, Esq. (RI #4484)
National Grid
280 Melrose Street
Providence, RI 02907
(781) 907-2153



Adam M. Ramos, Esq. (RI #7591)
Hinckley, Allen & Snyder LLP
100 Westminster Street, Suite 1500
Providence, RI 02903-2319
(401) 457-5164

Dated: December 19, 2017

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4770
Discovery Log

DATA SET	DATA REQUEST	DATE ISSUED	DATE FILED	WITNESS	TOPIC	CONFIDENTIAL ATTACHMENT
COMMISSION SET 1						
COMMISSION SET 1	PUC 1-1	11/28/2017	12/19/2017	Melissa Little	Financial Reporting	
COMMISSION SET 1	PUC 1-2	11/28/2017	12/19/2017	Melissa Little	Financial Reporting	
COMMISSION SET 1	PUC 1-3	11/28/2017	12/19/2017	Melissa Little	Financial Reporting	
COMMISSION SET 1	PUC 1-4	11/28/2017	12/19/2017	Melissa Little	Financial Reporting	
COMMISSION SET 1	PUC 1-5	11/28/2017	12/19/2017	Melissa Little	Income and Cash Flow Statements	
COMMISSION SET 1	PUC 1-6	11/28/2017	12/19/2017	Melissa Little	Affiliates	
COMMISSION SET 1	PUC 1-7	11/28/2017	12/19/2017	Melissa Little	Audits	Attachment 1-7-1, Attachment 1-7-2
COMMISSION SET 1	PUC 1-8	11/28/2017	12/19/2017	Timothy Horan	Investor Relations	
COMMISSION SET 1	PUC 1-9	11/28/2017	12/19/2017	Timothy Horan	Investor Relations	
COMMISSION SET 1	PUC 1-10	11/28/2017	12/19/2017	Joshua Nowak	Treasury	
COMMISSION SET 1	PUC 1-11	11/28/2017	12/19/2017	Melissa Little	Earned Return on Average Common Equity	
COMMISSION SET 1	PUC 1-12	11/28/2017	12/19/2017	Melissa Little	Earnings Report Filed in Docket 4323	
COMMISSION SET 1	PUC 1-13	11/28/2017	12/19/2017	Joseph Gredder, Theodore Poe, Melissa Little	Forecasts	
COMMISSION SET 1	PUC 1-14	11/28/2017	12/19/2017	Joshua Nowak	Debt and Equity Rating	
COMMISSION SET 1	PUC 1-15	11/28/2017	12/19/2017	Melissa Little	Plant In Service	
COMMISSION SET 1	PUC 1-16	11/28/2017	12/19/2017	John Currie, Sonny Anand	Capital Authorization	
COMMISSION SET 1	PUC 1-17	11/28/2017	12/19/2017	Melissa Little	Construction Work In Progress	
COMMISSION SET 1	PUC 1-18	11/28/2017	12/19/2017	Melissa Little	Depreciation Accrual Rates	
COMMISSION SET 1	PUC 1-19	11/28/2017	12/19/2017	Melissa Little	Company's Test Year O&M Expense Accounts	
COMMISSION SET 1	PUC 1-20	11/28/2017	12/19/2017	Melissa Little and the Legal Department	Service Level Agreements	Attachment 1-20-1, Attachment 1-20-35
COMMISSION SET 1	PUC 1-21	11/28/2017	12/19/2017	Melissa Little	Expenses	
COMMISSION SET 1	PUC 1-22	11/28/2017	12/19/2017	Melissa Little	Allocated Expenses	
COMMISSION SET 1	PUC 1-23	11/28/2017	12/19/2017	Melissa Little	Extraordinary Income	
COMMISSION SET 1	PUC 1-24	11/28/2017	12/19/2017	John Isberg	New Service Offerings	
COMMISSION SET 1	PUC 1-25	11/28/2017	12/19/2017	Melissa Little	Miscellaneous Revenues	
COMMISSION SET 1	PUC 1-26	11/28/2017	12/19/2017	Melissa Little	Chart of Accounts	
COMMISSION SET 1	PUC 1-27	11/28/2017	12/19/2017	Maureen Heaphy	Employee Bonus and Incentive Compensation	
COMMISSION SET 1	PUC 1-28	11/28/2017	12/19/2017	Maureen Heaphy	Compensation and Benefits	
COMMISSION SET 1	PUC 1-29	11/28/2017	12/19/2017	William H. Hilbrunner, Melissa Little	Corporate Policy	
COMMISSION SET 1	PUC 1-30	11/28/2017	12/19/2017	Melissa Little	Loans or Forgiveness of Debts	
COMMISSION SET 1	PUC 1-31	11/28/2017	12/19/2017	Melissa Little	Wages, Salaries and Overheads	
COMMISSION SET 1	PUC 1-32	11/28/2017	12/19/2017	Maureen Heaphy	Wage and Salary Increases	
COMMISSION SET 1	PUC 1-33	11/28/2017	12/19/2017	Maureen Heaphy	Wage Contracts	
COMMISSION SET 1	PUC 1-34	11/28/2017	12/19/2017	Maureen Heaphy	Wage and Salary Increases	
COMMISSION SET 1	PUC 1-35	11/28/2017	12/19/2017	Maureen Heaphy	Number of Employees	
COMMISSION SET 1	PUC 1-36	11/28/2017	12/19/2017	Maureen Heaphy	Overtime Wages, Salaries, Hours	
COMMISSION SET 1	PUC 1-37	11/28/2017	12/19/2017	Melissa Little	Actuarial Reports	
COMMISSION SET 1	PUC 1-38	11/28/2017	12/19/2017	Maureen Heaphy	Non-Pension Benefits	
COMMISSION SET 1	PUC 1-39	11/28/2017	12/19/2017	Maureen Heaphy	Health Care Costs	
COMMISSION SET 1	PUC 1-40	11/28/2017	12/19/2017	Maureen Heaphy	Health Care Costs	

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4770
Discovery Log

DATA SET	DATA REQUEST	DATE ISSUED	DATE FILED	WITNESS	TOPIC	CONFIDENTIAL ATTACHMENT
COMMISSION SET 1	PUC 1-41	11/28/2017	12/19/2017	William H. Hilbrunner, Melissa Little	Leased Vehicles	
COMMISSION SET 1	PUC 1-42	11/28/2017	12/19/2017	William H. Hilbrunner, Melissa Little	Vehicle Replacement	
COMMISSION SET 1	PUC 1-43	11/28/2017	12/19/2017	Melissa Little	Aircraft and Watercraft	
COMMISSION SET 1	PUC 1-44	11/28/2017	12/19/2017	Melissa Little	Operations and Maintenance Expenses	
COMMISSION SET 1	PUC 1-45	11/28/2017	12/19/2017	Melissa Little	Dues and Membership	
COMMISSION SET 1	PUC 1-46	11/28/2017	12/19/2017	Melissa Little	Administrative Expenses	
COMMISSION SET 1	PUC 1-47	11/28/2017	12/19/2017	Melissa Little	Insurance Policies	
COMMISSION SET 1	PUC 1-48	11/28/2017	12/19/2017	Timothy Kiernan, Melissa Little	Insurance Policies	
COMMISSION SET 1	PUC 1-49	11/28/2017	12/19/2017	Maureen Heaphy	Insurance Policies	
COMMISSION SET 1	PUC 1-50	11/28/2017	12/19/2017	Timothy Kiernan, Melissa Little	Self insurance Procedure	
COMMISSION SET 1	PUC 1-51	11/28/2017	12/19/2017	Melissa Little	Lease Type Expenses	
COMMISSION SET 1	PUC 1-52	11/28/2017	12/19/2017	Melissa Little	Miscellaneous Deferred Debits	
COMMISSION SET 1	PUC 1-53	11/28/2017	12/19/2017	Melissa Little	Out of Period Adjustments	
COMMISSION SET 1	PUC 1-54	11/28/2017	12/19/2017	Melissa Little	Deferred Credits	
COMMISSION SET 1	PUC 1-55	11/28/2017	12/19/2017	Melissa Little	Outside Services	
COMMISSION SET 1	PUC 1-56	11/28/2017	12/19/2017	Melissa Little, Jody Allison	Gross Write-offs and Recoveries	
COMMISSION SET 1	PUC 1-57	11/28/2017	12/19/2017	Melissa Little, Jody Allison	Uncollectibles	
COMMISSION SET 1	PUC 1-58	11/28/2017	12/19/2017	Melissa Little, Jody Allison	Uncollectible Write-Offs	
COMMISSION SET 1	PUC 1-59	11/28/2017	12/19/2017	Melissa Little, Jody Allison	Accounting Policies - Write-Offs	
COMMISSION SET 1	PUC 1-60	11/28/2017	12/19/2017	Melissa Little	Unbilled Revenues	
COMMISSION SET 1	PUC 1-61	11/28/2017	12/19/2017	Melissa Little	Advertising and Media Related Costs	
COMMISSION SET 1	PUC 1-62	11/28/2017	12/19/2017	Melissa Little	Donations	
COMMISSION SET 1	PUC 1-63	11/28/2017	12/19/2017	Melissa Little	Lobbying Expenses	
COMMISSION SET 1	PUC 1-64	11/28/2017	12/19/2017	Melissa Little	Corporate Identification	
COMMISSION SET 1	PUC 1-65	11/28/2017	12/19/2017	Melissa Little and the Legal Department	Legal Matters	
COMMISSION SET 1	PUC 1-66	11/28/2017	12/19/2017	Melissa Little and the Legal Department	Legal Matters	
COMMISSION SET 1	PUC 1-67	11/28/2017	12/19/2017	Melissa Little and the Legal Department	Legal Matters	
COMMISSION SET 1	PUC 1-68	11/28/2017	12/19/2017	Melissa Little and the Legal Department	Legal Matters	
COMMISSION SET 1	PUC 1-69	11/28/2017	12/19/2017	Melissa Little	Legal Matters	
COMMISSION SET 1	PUC 1-70	11/28/2017	12/19/2017	Melissa Little	Property Taxes	
COMMISSION SET 1	PUC 1-71	11/28/2017	12/19/2017	Melissa Little	Property Taxes	
COMMISSION SET 1	PUC 1-72	11/28/2017	12/19/2017	Melissa Little	Property Taxes	
COMMISSION SET 1	PUC 1-73	11/28/2017	12/19/2017	Melissa Little	Book/Tax Timing Differences	
COMMISSION SET 1	PUC 1-74	11/28/2017	12/19/2017	Melissa Little	Corporate Charges	
COMMISSION SET 1	PUC 1-75	11/28/2017	12/19/2017	Melissa Little	Outside Services Charges	
COMMISSION SET 1	PUC 1-76	11/28/2017	12/19/2017	Melissa Little	Common Plant	
COMMISSION SET 1	PUC 1-77	11/28/2017	12/19/2017	Melissa Little	Affiliates	
COMMISSION SET 1	PUC 1-78	11/28/2017	12/19/2017	Melissa Little	Political Contributions	
COMMISSION SET 1	PUC 1-79	11/28/2017	12/19/2017	Melissa Little	Outside Legal Fees	
COMMISSION SET 1	PUC 1-80	11/28/2017	12/19/2017	Melissa Little	Consulting Services Expenses	
COMMISSION SET 1	PUC 1-81	11/28/2017	12/19/2017	Melissa Little	Organization Chart	

The Narragansett Electric Company
d/b/a National Grid
RIPUC Docket No. 4770
Discovery Log

DATA SET	DATA REQUEST	DATE ISSUED	DATE FILED	WITNESS	TOPIC	CONFIDENTIAL ATTACHMENT
COMMISSION SET 1	PUC 1-82	11/28/2017	12/19/2017	Maureen Heaphy	Employee Termination Contracts	
COMMISSION SET 1	PUC 1-83	11/28/2017	12/19/2017	Melissa Little, Jody Allison	Physical Terminations	
COMMISSION SET 1	PUC 1-84	11/28/2017	12/19/2017	Melissa Little	Employee Location	
COMMISSION SET 1	PUC 1-85	11/28/2017	12/19/2017	Ann Leary	Customers in Each Customer Class	
COMMISSION SET 1	PUC 1-86	11/28/2017	12/19/2017	John Isberg	Advertising	
COMMISSION SET 1	PUC 1-87	11/28/2017	12/19/2017	Howard Gorman	System Peak	
COMMISSION SET 1	PUC 1-88	11/28/2017	12/19/2017	Howard Gorman	Customer Usage	
COMMISSION SET 1	PUC 1-89	11/28/2017	12/19/2017	Howard Gorman	Net Metering	
COMMISSION SET 1	PUC 1-90	11/28/2017	12/19/2017	Anuraag Bhargava, Daniel J. DeMauro, Mukund Ravipaty, Melissa Little	SAP	
COMMISSION SET 2						
COMMISSION SET 2	PUC 2-1	11/28/2017	12/15/2017	David Beron	E-183 Undergrounding and Customer Credit	
COMMISSION SET 2	PUC 2-2	11/28/2017	12/15/2017	David Beron	E-183 Undergrounding and Customer Credit	
COMMISSION SET 2	PUC 2-3	11/28/2017	12/15/2017	Scott M. McCabe	E-183 Undergrounding and Customer Credit	

Certificate of Service

I hereby certify that a copy of the cover letter and/or any materials accompanying this certificate were electronically transmitted and/or mailed to the individuals listed below.

Najat Coye

December 19, 2017
Date

Docket No. 4770 - National Grid – Rate Application
Service list updated 12/14/2017

Name/Address	E-mail Distribution List	Phone
National Grid Celia O'Brien, Esq. Jennifer Hutchinson, Esq. National Grid 280 Melrose St. Providence, RI 02907	Celia.obrien@nationalgrid.com ;	781-907-2153
	Jennifer.hutchinson@nationalgrid.com ;	401-784-7288
	Najat.coye@nationalgrid.com ;	
	Joanne.scanlon@nationalgrid.com ;	
	Bill.Malee@nationalgrid.com ;	
	Melissa.little@nationalgrid.com ;	
	William.richer@nationalgrid.com ;	
	Theresa.burns@nationalgrid.com ;	
	Ann.leary@nationalgrid.com ;	
	Scott.mccabe@nationalgrid.com ;	
	Najat.coye@nationalgrid.com ;	
kayte.o'neill2@nationalgrid.com ;		
Timothy.roughan@nationalgrid.com ;		
Adam Ramos, Esq. Hinckley Allen Hinckley Allen 100 Westminster Street, Suite 1500 Providence, RI 02903-2319	aramos@hinckleyallen.com ;	401-457-5164
Division of Public Utilities (Division) Leo Wold, Esq. Dept. of Attorney General 150 South Main St. Providence, RI 02903	Lwold@riag.ri.gov ;	404-274-4400
	Jmunoz@riag.ri.gov ;	
	Dmacrae@riag.ri.gov ;	
Steve Scialabba, Chief Accountant Division of Public Utilities 89 Jefferson Blvd. Warwick, RI 02888	Steve.scialabba@dpuc.ri.gov ;	401-780-2140
	Macky.McCleary@dpuc.ri.gov ;	
	Jonathan.Schrag@dpuc.ri.gov ;	
	John.bell@dpuc.ri.gov ;	
	Al.mancini@dpuc.ri.gov ;	
	Thomas.kogut@dpuc.ri.gov ;	
	Aliza.wasserman@dpuc.ri.gov ;	
Tim Woolf Jennifer Kallay Synapse Energy Economics	twoolf@synapse-energy.com ;	617-661-3248
	jkallay@synapse-energy.com ;	

22 Pearl Street Cambridge, MA 02139	mwhited@synapse-energy.com ; jhall@synapse-energy.com ;	
David Effron Berkshire Consulting 12 Pond Path North Hampton, NH 03862-2243	Djeffron@aol.com ;	603-964-6526
Bruce Oliver Tim Oliver Revilo Hill Associates 7103 Laketree Drive Fairfax Station, VA 22039	Boliver.rha@verizon.net ; tim.b.oliver@gmail.com ;	703-569-6480
Matt Kahal 1108 Pheasant Crossing Charlottesville, VA 22901	mkahal@exeterassociates.com ;	434-964-0604
Ronald Gerwatowski	gerwat@verizon.net ;	508-259-7963
M. Ballaban LaCapra Associates	mballaban@lacapra.onmicrosoft.com ;	
T. Bennett S. Bobo Daymark Energy Advisors	tbennett@daymarkea.com ; sbobo@daymarkea.com ;	
Office of Energy Resources (OER) Andrew Marcaccio, Esq. Dept. of Administration Division of Legal Services One Capitol Hill, 4 th Floor Providence, RI 02908	Andrew.Marcaccio@doa.ri.gov ;	401-222-8880
Carol Grant, Commissioner Office of Energy Resources	Carol.grant@energy.ri.gov ; Christopher.Kearns@energy.ri.gov ; Danny.Musher@energy.ri.gov ; Nicholas.Ucci@energy.ri.gov ; Becca.Trietch@energy.ri.gov ; Carrie.Gill@energy.ri.gov ;	401-574-9100
Conservation Law Foundation Jerry Elmer, Esq. Max Greene, Esq. Conservation Law Foundation 235 Promenade Street Suite 560, Mailbox 28 Providence, RI 02908	jelmer@clf.org ; mgreene@clf.org ;	401-228-1904
Original & 9 copies file w/: Luly E. Massaro, Commission Clerk Public Utilities Commission 89 Jefferson Blvd. Warwick, RI 02888	Luly.massaro@puc.ri.gov ; Cynthia.WilsonFrias@puc.ri.gov ; Alan.nault@puc.ri.gov ; Todd.bianco@puc.ri.gov ; Margaret.hogan@puc.ri.gov ;	401-780-2107
Interested Persons		
EERMC Marisa Desautel, Esq . Kate Desrochers	marisa@desautelesq.com ; guerard@optenergy.com ; kdesrochers@veic.org ; loiter@optenergy.com ;	401-477-0023

Bob Chatham	bchatham@vcharge-energy.com ;	401-742-8264
John DiTomasso, AARP	jditomasso@aarp.org ;	401-248-2655
Frank Epps, EDP	Frank@edp-energy.com ;	
Matt Davey	mdavey@ssni.com ;	
NECEC	jbesser@necec.org ;	
Janet Besser	jdickerson@necec.org ;	
Jamie Dickerson		
John DiTomasso, AARP	jditomasso@aarp.org ;	401-248-2655
Larry Allen, Dept. of Navy	Larry.r.allen@navy.mil ;	
George Wiley Center	georgewileycenterri@gmail.com ;	
Camilo Viveiros	Camiloviveiros@gmail.com ;	
Chloe Chassaing	chloechassaing@hotmail.com ;	
Acadia Center	ENiedowski@acadiacenter.org ;	401-276-0600
Erika Niedowski	Mlebel@acadiacenter.org ;	
Mark Lebel	Aboyd@acadiacenter.org ;	
Amy Boyd		
Kat Burnham, PPL	kat@ripower.org ;	401-861-6111
Nathan Phelps	nathan@votesolar.org ;	
Seth H. Handy, Esq. Handy Law, LLC	seth@handylawllc.com ;	401-626-4839
John Willumsen-Friedman, Esq. Center for Justice	jwillumsen@centerforjustice.org ;	
Douglas W. Gablinske, The Energy Council of RI (TEC-RI)	doug@tecri.org ;	

STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION

IN RE: THE NARRAGANSETT ELECTRIC COMPANY :
d/b/a NATIONAL GRID – ELECTRIC AND GAS : DOCKET NO. 4770
DISTRIBUTION RATE FILING :

COMMISSION'S FIRST SET OF DATA REQUESTS
DIRECTED TO NATIONAL GRID
(Issued November 28, 2017)

This proceeding is a ratemaking proceeding for the electric and gas distribution operations of The Narragansett Electric Company, which together represent the entirety of the regulated operations conducted in Rhode Island by the Company.

In this case, the regulated entity is the “Company,” where the reference is to both electric and gas distribution operations on a collective basis.

Where there is a need to refer to the “stand-alone” or individual electric or gas operations of The Narragansett Electric Company, the terms will be “Narragansett Electric” or “Narragansett Gas,” respectively.

“National Grid USA” will be referenced as “National Grid”

“National Grid plc” will be spelled out as is.

Where the question references “Company” and the response is different for, or expenses are recovered through distribution rates specific to Narragansett Electric or Narragansett Gas, please respond for each, clearly labeling the response to the appropriate entity.

1-1 Please provide the following for National Grid and the Company for the years 2012 through 2016 as they become available:

- (a) the 10-Ks;
- (b) the 8-Ks;
- (c) the Annual Reports to shareholders and bondholders;
- (d) the Proxy statements;
- (e) the FERC Form 60s;
- (f) any auditor’s reports;
- (g) the five-year or ten-year financial and statistical summaries; and
- (h) the consolidating statements.

Response can be found in Book 1 part 1 through part 11.

1-2 Please provide the 10-Qs and quarterly reports to bondholders and shareholders for National Grid and the company for the years 2016 and 2017 as they become available.

Response can be found in Book 2 on Bates pages 1 - 33.

1-3 Please provide the prospectus distributed in anticipation of the most recent sale of any equity or debt by the Company and National Grid.

Response can be found in Book 2 on Bates page 34.

1-4 Please provide a list or index, or any document which contains a list or index of the Company's periodic reports (i.e. monthly, quarterly) used internally.

Response can be found in Book 2 on Bates page 35.

1-5 Please provide the following information for the Company for each month of the fiscal years 2015, 2016 and 2017:

- (a) the budgeted and actual monthly income statements;
- (b) a Statement of Cash Flows; and
- (c) the short-term debt balance, short-term interest expense and rate as well as a comparison of the short-term interest rate to the contemporaneous prime rate.

Response can be found in Book 2 on Bates pages 36 - 58.

1-6 Please provide the following information for the fiscal years 2012 through 2017:

- (a) capitalization table for each of the affiliates of the Company showing the outstanding balances of capital, the capital ratios, and the costs of capital; and
- (b) the annual balance sheets and income statements for each of the affiliates of the Company.

Response can be found in Book 2 on Bates pages 59 - 61.

1-7 Please provide a copy of any and all management, organizational, construction, and performance audits of any kind of the Company and any of its affiliates performed by company personnel, contractors, consultants, any regulatory body, or any organization or individual whatsoever during the most recent five years.

Response can be found in Book 2 on Bates pages 62 - 67.

1-8 Please provide copies of all speeches made by National Grid to its shareholders from March 1, 2016 to the present.

Response can be found in Book 2 on Bates pages 68 - 256.

- 1-9 Please provide all statements and materials supplied by National Grid and the Company to financial analysts, securities analysts, rating agencies and utility groups from January 1, 2014 to the present.

Response can be found in Book 3 part 1 through part 7.

- 1-10 Please provide all publications, rating announcements, etc., concerning the National Grid and its affiliates by Moody's, Standard & Poor's, Argus and other similar entities from January 1, 2014 through the present.

Response can be found in Book 4 pages 1 - 161.

- 1-11 Please provide the earned return on average common equity for the twelve-month periods ending December 31st for the years 2012 to 2016 for National Grid and the Company.

Response can be found in Book 4 pages 162 - 163.

- 1-12 Please re-file copies of earnings reports filed in Docket No. 4323, for Narragansett Electric for the twelve-month periods ending December 31st for the years 2013 to 2016 which include not only the energy efficiency (C&LM) incentive, but also the Long-Term Contracting for Renewable Energy remuneration, Distributed Generation Standard Contracts remuneration, and Renewable Energy Growth Program incentive.

Response can be found in Book 4 pages 164 - 219.

- 1-13 Please provide the following information for the Company:

- (a) the most recent five-year sales volume forecasts for each of its customer classes;
- (b) the most recent five-year financial forecast; and
- (c) the most recent projected financings for the next five years.

Response can be found in Book 4 pages 220 - 227.

- 1-14 Please provide the debt and equity rating history for the fiscal years 2015 through 2017 for National Grid and its affiliates.

Response can be found in Book 4 pages 228 - 229.

- 1-15 Please provide the following items for the Company for each of the most recent five calendar years (2012-2016):
- (a) the plant in service by account and the additions, retirements, transfers, and adjustments to each of those accounts;
 - (b) the year-end construction work in progress balances; and
 - (c) the land and rights-of-way by account.

Response can be found in Book 4 pages 230 - 272.

- 1-16 Please provide the capital authorization and closing reports for all projects begun or finished since January 1, 2013 of \$250,000 or more in magnitude.

**GAS Response can be found in Book 5 part 1 through part 6.
ELECTRIC Response can be found in Book 21 part 1 through part 6.**

- 1-17 Please itemize and quantify all year 2015 and year 2016 costs allocated or assigned to Construction Work In Progress.

Response can be found in Book 6 on Bates pages 1 - 24.

- 1-18 Please provide the fiscal year 2015 and year 2016 depreciation accrual rates and depreciation expense by plant account.

Response can be found in Book 6 on Bates pages 25 - 29.

- 1-19 Please itemize and quantify all depreciation, income tax, property tax, equity return, or interest costs included in the Company's test year Operations and Maintenance Expense Accounts either directly or through an allocation or assignment from an affiliated company.

Response can be found in Book 6 on Bates pages 30 - 32.

- 1-20 Please provide all written contracts between the Company and its affiliates. Provide a narrative description of any unwritten contracts between the Company and any affiliate, including all material terms.

Response can be found in Book 7 part 1 through part 4.

- 1-21 Please itemize all line item expenses from the Company allocated to any of the Company's affiliates.

Response can be found in Book 8 on Bates pages 1 - 7.

- 1-22 Please itemize all line item expenses allocated or assigned to the Company from each of its affiliates.

Response can be found in Book 8 on Bates pages 8 - 15.

- 1-23 Please itemize and quantify all extraordinary income booked by the Company during the fiscal years 2013 through 2017.

Response can be found in Book 8 on Bates page 16.

- 1-24 Please describe the types of new service offerings being developed by the Company. In responding to this question, please provide a detailed description of the new service being developed or being considered by the company for future development. New services can be defined as any new product or service which will be provided by the Company and will be available to consumers for a fee or be made available to the public free of charge (equipment sales, rentals, or service; conservation and load management services; energy audits or advice.).

Response can be found in Book 8 on Bates pages 17 - 18.

- 1-25 Please provide for the service companies and the Company a detailed breakdown of Miscellaneous Revenues by source. Please also provide the amount of expenses by account associated with generating these miscellaneous revenues.

Response can be found in Book 8 on Bates pages 19 - 20.

- 1-26 Please provide a chart of accounts for the company for the twelve month periods ended 12/31/2014, 12/31/2015 and 12/31/2016. Please include subaccounts, titles to the subaccounts, and balances of the subaccounts.

Response can be found in Book 8 on Bates pages 21 - 115.

- 1-27 Please itemize and quantify all National Grid and Company employee bonuses and incentive compensation plan payments incurred during the calendar years 2014, 2015 and 2016.

Response can be found in Book 9 part 1 through part 2.

- 1-28 Please itemize and quantify for each National Grid and Company management employee and officer the compensation and benefits including bonuses paid to each management employee and officer during the calendar years 2014, 2015 and 2016.

Response can be found in Book 10 part 1 through part 2.

- 1-29 Please explain the corporate policy on National Grid, service company and Company employee and officer use of Company vehicles, noting the make, model, year, and

original cost or annual lease expense of the Company vehicle used by each officer. Please also indicate whether any directors, officers, or other employees of the Company have Company supplied chauffeurs and the test year costs of those chauffeurs.

Response can be found in Book 11 on Bates page 1.

1-30 Please provide the following for the calendar years 2015 and 2016 for each employee, officer, director, shareholder or investor of National Grid, its service companies:

- (a) the amount(s) of all loans or forgiveness of debts provided by the Company to such individual;
- (b) the type(s) and costs(s) of all services provided by the Company to such individual; and
- (c) the type(s) and cost(s) of all products provided by the Company to such individual.

Response can be found in Book 11 on Bates pages 2 - 4.

1-31 Please provide both the dollar amount and percent capitalized of the wages, salaries and overheads for each of the last five years.

Response can be found in Book 11 on Bates pages 5 - 7.

1-32 Please provide a five-year history of wage and salary increases for each of the employee groups (e.g. union, clerical, management).

Response can be found in Book 11 on Bates pages 8 - 9.

1-33 Please provide a copy of all employee wage contracts in effect at any time during the years 2015, 2016, and 2017 and those signed since 2016.

Response can be found in Book 12 part 1 through part 4.

1-34 Please provide a timing schedule of the wage and salary increases for each employee group in each of the last five years (e.g. union, clerical, management).

Response can be found in Book 13 on Bates pages 1 - 2.

1-35 Please provide the number of National Grid and Company employees at the end of each month for the years 2014 through 2016 by employee group (e.g. union, clerical, management).

Response can be found in Book 13 on Bates pages 3 - 6.

- 1-36 Please provide the annual percentage of overtime hours worked compared to total hours worked for each of the last five calendar years. Please also provide the total expense associated with overtime wages and salaries incurred during the years 2015 and 2016.

Response can be found in Book 13 on Bates pages 7 - 8.

- 1-37 Please provide the latest actuarial reports used to determine the Company's pension costs and post retirement benefits other than pension costs.

Response can be found in Book 13 on Bates pages 9 - 64.

- 1-38 Please provide a breakdown of the year-end 2015 and 2016 expenses, for all non-pension benefits available to employees. For each benefit, include a detailed description of the benefit and the conditions that each employee must meet to be entitled to the benefit.

Response can be found in Book 14 on Bates pages 1 - 285.

- 1-39 Please provide the average health care cost per employee incurred by the Company during the year 2015 and 2016. Please provide the working rate used for each of the respective years.

Response can be found in Book 14 on Bates pages 286 - 289.

- 1-40 Please provide a complete and detailed description of the methods that the Company is using to reduce its health care costs. Please include, but do not limit the description to: (a) the Company's provision of incentives for employees to use the least cost insurer and (b) the company's efforts to provide incentives for employees to contribute to lower health care costs.

Response can be found in Book 14 on Bates pages 290 - 291.

- 1-41 Please provide an itemized list of all vehicles leased or purchased by National Grid and the Company. For each vehicle, please provide the make, model, year and rental charge or original book value. In the response, please separate the distribution company vehicles out by Narragansett Electric and Narragansett Gas. For purposes of this question, vehicle includes all equipment used on or off-road for electric or gas operations (i.e., backhoes, trailers, etc.).

Response can be found in Book 15 on Bates pages 1-33.

- 1-42 Please provide any policy, written or otherwise, governing the replacement of vehicles for Company use, including any employee-assigned vehicles. For purposes of this question, vehicle includes all equipment used on or off-road for electric or gas operations (i.e., backhoes, trailers, etc.).

Response can be found in Book 15 on Bates pages 34-36.

- 1-43 Please provide an itemized list of all aircraft and watercraft leased or purchased by National Grid, the service companies and the Company. For each aircraft and watercraft, please provide the make, model, year, rental charge and original book value.

Response can be found in Book 15 on Bates page 37.

- 1-44 Please provide a list of all instances where food, beverage, entertainment, and travel costs included in operations and maintenance expenses in the years 2015 and 2016 exceed \$2500 per event. Please also provide for each item, the date, location, number of employees attending, number of non-employees attending, and the nature of the event.

Response can be found in Book 22 on Bates pages 1-2.

- 1-45 Please provide a list of all organizations to which the Company pays dues, whether directly or as a part of a corporate allocation in the Test Year. For each organization, please indicate the purpose of membership in the organization.

Response can be found in Book 15 on Bates pages 38-39.

- 1-46 Please itemize and quantify the year 2015 and year 2016 costs included in Account 922—Administrative Expenses Transferred.

Response can be found in Book 15 on Bates page 40.

- 1-47 Please provide the following information regarding the Company's insurance policies:
- (a) a breakdown of the insurance expenses recorded in each of the years 2015 and 2016 and, for each insurance expense, please provide a detailed explanation for any differences between the expense amounts included in the year and the insurance premiums paid during that year;
 - (b) the invoices for the insurance premiums paid in each of the years 2015 and 2016 and, if the Company only pays a portion of the insurance expense, please provide a summary of each insurance invoice showing the total expense and the Company's allocated portion of the expense;
 - (c) if any insurance expense (including premiums) recorded in each of the years 2015 and 2016 have been allocated or assigned to the Company from any affiliate, please indicate the amount allocated or assigned and the method of assignment and provide copies of all policies for which expenses are allocated or assigned; and
 - (d) an itemization and quantification of any insurance proceeds (e.g. reimbursements, recoveries, refunds, distribution, adjustments) received by the Company during or since the year 2015, along with a complete and detailed description of the accounting treatment given those proceeds.

Response can be found in Book 16 part 1 through part 2.

- 1-48 Please provide the terms of any insurance policies and the annual expense amount relating to “key man” or other corporate life insurance (aka “janitor’s insurance) where National Grid and/or the Company or its affiliate is a beneficiary.

Response can be found in Book 17 on Bates page 1.

- 1-49 Please provide the terms of any insurance policies and the annual expense amount relating to any corporate life insurance (aka “janitor’s insurance”) where the employee’s family rather than the Company is the beneficiary and confirm whether the related expenses have been captured in the employee benefit expense within the rate filing. Identify where in the filing those expenses have been captured.

Response can be found in Book 17 on Bates page 2.

- 1-50 Please provide a complete and detailed description of each self-insurance procedure that National Grid and the Company have in effect. For each please provide (but do not limit the response to) the following information:

- (a) a description of the nature of the risks being insured;
- (b) the year 2015 and the year 2016 accounting of the self-insurance plan costs including the year beginning and ending reserve balance and an itemization of the debits and the credits to the reserve during the year as well as a five-year history of the debits and credits to that reserve

Response can be found in Book 17 on Bates pages 3-9.

- 1-51 Please provide all lease-type expenses paid during each of the years 2014, 2015 and 2016. (If the company only pays a portion of the total lease expense, please provide a summary of each lease invoice showing the total lease expense and the Company’s allocated portion of the expense.) Vehicles are excluded if included in response to 1-41.

Response can be found in Book 17 on Bates pages 10-51.

- 1-52 Please provide a detailed breakdown of the Company’s 2015 and 2016 year-end balances of miscellaneous deferred debits. Please also indicate the amounts and the accounts that were charged when the deferred debits were credited during those years.

Response can be found in Book 17 on Bates pages 52-58.

- 1-53 Please set forth the accounting information concerning all out-of-period book adjustments made to book entries for the calendar years 2014, 2015 and 2016.

Response can be found in Book 22 on Bates pages 3-5.

- 1-54 Please provide a detailed breakdown of the Company's 2015 and 2016 year-end balances of other deferred credits. Please also indicate the amounts and the accounts that were charged when the deferred credits were debited during those years.

Response can be found in Book 22 on Bates pages 6-10.

- 1-55 Please itemize and quantify the costs of National Grid and the Company's Outside Services Employed during each of the years 2015 and 2016.

Response can be found in Book 17 on Bates pages 59-61.

- 1-56 Please provide for each of the last three fiscal years, the gross write-offs and recoveries for each customer class.

Response can be found in Book 17 on Bates pages 62-66.

- 1-57 Please identify all municipal, state, other public accounts, including quasi-public agencies where there is a past due balance greater than 90 days. Please include the account balance.

Response can be found in Book 17 on Bates pages 67-69.

- 1-58 Please identify all uncollectable write-offs for each year 2013-2016 where write-offs were:

- (a) Residential >\$2,500 (electric) or >\$3,500 (gas) (please break out between A-16, A-60, Residential Heating, Residential Low-Income Heating, Residential Non-Heating, and Residential Low-Income Non-Heating);
- (b) C-06 >\$2,500 (electric) or >\$3,500 (gas);
- (c) G-02, G-32, G-62 >\$5,000 (electric or gas);
- (d) Please provide the accounts receivable ageing for residential customers, commercial customers, industrial customers, and public accounts separately.

Response can be found in Book 17 on Bates pages 70-200.

- 1-59 Please provide a detailed description of the Company's accounting policies governing the write-off of accounts receivable during the fiscal years 2015-2017.

Response can be found in Book 17 on Bates page 201.

- 1-60 Please provide a detailed description of the Company's method of accounting for unbilled revenues. Please also provide a complete and detailed description of the formula used to determine the amount of test year end unbilled revenue.

Response can be found in Book 17 on Bates page 202.

- 1-61 Please itemize by account and amount all advertising and media-related costs included in operations and maintenance expense, and source of funds. Please also include a copy of each advertisement and the cost of each for fiscal years 2015-2017.

Response can be found in Book 18 on Bates pages 1-126.

- 1-62 Please itemize the amounts of donations made to charitable organizations by National Grid, its service companies and the Company during each of the years 2014, 2015, 2016.

Response can be found in Book 22 on Bates pages 11-22.

- 1-63 Please itemize the amounts of lobbying expenses included in operations and maintenance expense for each of the years 2015 and 2016. For purposes of this request, lobbying is defined by R.I. Gen. Laws § 42-139.1-3.

Response can be found in Book 18 on Bates page 127.

- 1-64 Please provide the expenses for each of the years 2015 and 2016 relating to corporate identification. Please itemize all expenses relating to any National Grid, National Grid service company, and the Company name changes, logo changes, notices of new service centers, and any expense relating to National Grid's, service company's and the Company's name being printed on "give-a-way" items, such as mugs, shirts, etc.

Response can be found in Book 18 on Bates pages 128-129.

- 1-65 Please provide in list form the details of all judgment and/or settlements resulting from suits brought which involved National Grid plc, National Grid and/or the Company as a defendant, which resulted in National Grid, its service companies and/or the Company, in each of the years 2015 and 2016, paying or agreeing to pay or being ordered to pay an amount in excess of \$10,000.

Response can be found in Book 18 on Bates pages 130-131.

- 1-66 Please provide in list form the details of all warranty claims the Company has pending including but not limited to the amount being sought, the manufacturer, the date the claim was submitted, the specific item(s) under warranty.

Response can be found in Book 18 on Bates page 132.

- 1-67 Please provide the combined total dollar amount of all legal suits presently pending in which National Grid plc, National Grid, and/or the Company is a defendant.

Response can be found in Book 18 on Bates pages 133-136.

- 1-68 Please provide the combined total dollar amount of all legal suits presently pending which have been filed by National Grid plc, National Grid, and/or the Company.

Response can be found in Book 18 on Bates pages 137-146.

- 1-69 Please provide in two lists the aggregate amount of all fines and/or penalties in excess of \$5,000 paid or agreed to be paid in whole or in part by National Grid and or the Company in the Test Year including the nature of each such fine or penalty, the date assessed, and the entity assessing National Grid, and/or the Company. Provide this information even if appeals are pending and note every instance of an appeal. Please indicate whether ratepayer funds were used to satisfy any of the penalties and explain the rationale.

Response can be found in Book 18 on Bates pages 147-148.

- 1-70 Please provide by community, the Company's property taxes paid in each of the calendar years 2015 and 2016, assessed valuation, and property tax rate. Please specify between real or tangible property tax, where applicable.

Response can be found in Book 18 on Bates pages 149-155.

- 1-71 Please provide the amount of tax abatements received by year for the last three years (2014-2016).

Response can be found in Book 18 on Bates page 156.

- 1-72 Please set forth the total dollar amount of property tax abatements which would result should all of the Company's presently pending abatement requests be granted. If an exact total cannot be supplied provide the Company's best estimate.

Response can be found in Book 18 on Bates page 157.

- 1-73 Please indicate whether the Company uses normalization accounting for all book/tax timing differences.

Response can be found in Book 18 on Bates page 158.

- 1-74 Please itemize and quantify all corporate charges assigned/allocated to the Company from National Grid and its service companies for each of the last three years (2014-2016).

Response can be found in Book 22 on Bates pages 23-104.

- 1-75 Please itemize and quantify all outside services charges assigned/allocated to the Company from National Grid and its service companies for each of the last three years (2014-2016).

Response can be found in Book 18 on Bates pages 159-162.

- 1-76 Please provide a complete and detailed description of the methodology that National Grid and its service companies use to allocate/assign to the Company plant that is common to more than one of its affiliates. Please also provide the workpapers, calculations, formulas, assumptions, and supporting documents used to determine each allocation or assignment.

Response can be found in Book 19 part 1 through part 4.

- 1-77 Please itemize and quantify all of the products and services provided to National Grid or any of its affiliates during the test year (7/1/16-6/30/17) by each of the firms who employ the directors of National Grid.

Response can be found in Book 20 on Bates page 1.

- 1-78 Please itemize and quantify the political contributions made by National Grid and/or The Narragansett Electric Company during the Test Year (7/1/16-6/30/17).

Response can be found in Book 20 on Bates page 2.

- 1-79 Please itemize and quantify the Company's total outside legal fees for each of the last five years (2012-2016).
- (a) For each PUC Docket, please provide the name of the law firm and the total paid.
 - (b) For each 12-month period, for Division formal termination hearings, please provide the name of the law firm(s) and the total paid.
 - (c) For each miscellaneous Division complaint that went to a formal hearing, please provide the name of the law firm and the total paid.

Response can be found in Book 20 on Bates pages 3 - 4.

- 1-80 Please itemize and quantify the expenses for each of the five years (2012-2016) associated with consulting services provided by National Grid, its service companies and the Company's outside auditors.

Response can be found in Book 20 on Bates page 5.

- 1-81 Please provide an organization chart showing National Grid's corporate structure and each of its subsidiaries and affiliates.

Response can be found in Book 20 on Bates pages 6 - 8.

1-82 Please provide copies of all employee termination contracts that National Grid and the Company has with its managers and directors.

Response can be found in Book 20 on Bates page 9.

1-83 Identify the number of physical terminations for nonpayment for each month for the last 36 months. Please break out each month by Residential – Protected, Residential – Standard and Non-Residential.

Response can be found in Book 20 on Bates pages 10 - 14.

1-84 Identify for each month beginning in January 2012, the number of employees whose primary work location is Rhode Island. Break each month down by number of employees assigned to Operations Centers, Special Purpose Facilities and Main Office Facilities.

Response can be found in Book 20 on Bates pages 15 - 21.

1-85 For each of the past five years (2012-2016) and to the present, please provide the number of customers in each customer class by month.

Response can be found in Book 20 on Bates pages 22 - 26.

1-86 Please provide copies of any documents the Company uses to advertise the availability of the A-60 rate to customers who are LIHEAP eligible but not receiving LIHEAP.

Response can be found in Book 20 on Bates pages 27 - 37.

1-87 Please provide the month of the system peak and the month of the peak for each customer class.

Response can be found in Book 20 on Bates page 38.

1-88 Please provide an analysis of customer usage in the A-16 and A-60 rate classes. Please provide the mean, median, and average usage for the 12-month period April to March and for the periods April-September and October-March for that same 12-month period.

Response can be found in Book 20 on Bates pages 39 - 41.

1-89 What percentage of A-16 and A-60 customers are engaged in some form of net metering (either through traditional net metering or a similar bill credit program)?

Response can be found in Book 20 on Bates pages 42 - 43.

1-90 Are there any remaining issues related to the rollout of SAP in 2012? If so, what are they and what are the projected expenses in the Rate Year?

Response can be found in Book 20 on Bates page 44.